IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF OKLAHOMA

STEPHEN MULLICAN and)	
KELLY MULLICAN,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 5:23-cv-00160-G
)	
STATE FARM FIRE AND)	
CASUALTY COMPANY,)	
)	
Defendant.)	

PLAINTIFFS' OBJECTIONS TO DEFENDANT'S EXHIBIT LIST

Plaintiffs Stephen Mullican and Kelly Mullican make the following objections to the proposed trial exhibits identified by Defendant on February 20, 2024 [Dkt. No. 32]. Plaintiffs reserve the right to amend or modify the objections set forth below based on any stipulation entered into by the Parties; corrections, revisions, or other changes to the underlying exhibits; any order from this Court on outstanding or future motions; as the facts of the case are developed through trial; and any ruling from the Court affecting admissibility. Plaintiffs reserve the right to file motions in limine with respect to any exhibits identified by Defendants. Plaintiffs reserve their objections under Federal Rules of Evidence 402 and 403. *See* Fed. R. Civ. P 26(a)(3)(B).

Plaintiffs also reserve any objections related to admissibility of identified exhibits if Defendant fails to lay an adequate foundation through witness testimony, authentication through witness testimony, lacking a witness with personal knowledge, or any containing

improper expert testimony. Plaintiffs cannot make such objections until the witness testimony and exhibit are proffered at trial.

Also, some objections listed below are to parts of voluminous exhibits (i.e. claim notes) which contain certain entries with impermissible legal conclusions, expert opinions, hearsay, etc., while other parts of the exhibit are otherwise admissible.

Notwithstanding the foregoing, Plaintiffs make the following objections.

No.	Exhibit Description	Basis for Objection		
2.	Insurance claim file summary prepared by State Farm	Incomplete; Hearsay; Cumulative		
3.	Insurance claim notes prepared by State Farm	Hearsay; Need for Personal Knowledge; Improper Expert Opinion, Improper Legal Conclusions; Cumulative		
4.	Insurance claim notes generated by internal State Farm system	Hearsay; Need for Personal Knowledge; Improper Expert Opinion, Improper Legal Conclusions, Cumulative		
9.	October 29, 2021 correspondence to Oklahoma Insurance Department from State Farm	Relevance; Improper Legal Conclusions; Cumulative		
172	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative		
173.	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative		
174.	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative		
175.	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative		
176.	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative		
177.	Account Statement to Plaintiffs prepared by Ian's Enterprise LLC	Relevance; Cumulative		
178.	Calls with Insureds (since 02/26/2022) Notes prepared by Ian's Enterprise LLC	Relevance; Cumulative		

180.	Calls with Valor Notes prepared by	Relevance; Cumulative		
	Ian's Enterprise LLC			
181.	Text Messages between Ian's Enterprise LLC and Plaintiffs	Relevance; Cumulative		
182.	•	Polovonos Cumulativo		
182.	Text Messages between Ian's Enterprise LLC and Plaintiffs	Relevance; Cumulative		
184.	Text Messages between Ian's	Relevance; Cumulative		
104.	Enterprise LLC and Chad Williams			
185.	Text Messages between Ian's	Relevance; Hearsay		
	Enterprise LLC and Doron Hoggatt			
186.	Text Messages between Ian's	Relevance; Hearsay		
	Enterprise LLC and Justin Gentry			
187.	Text Messages between Ian's	Relevance; Hearsay; Cumulative		
	Enterprise LLC and Doreen Rupert	·		
188.	October 4, 2021 email	Relevance; Cumulative		
	correspondence between-			
	Plaintiffs and Ian Enterprise LLC			
199.	June 3, 2021 Recording of Inbound	Relevance; Cumulative		
	Call from Valor Forensic Services to			
	Ian's Enterprise LLC			
200.	June 6, 2021 Recording of Inbound	Relevance; Cumulative		
	Call from Valor Forensic Services to			
	Ian's Enterprise LLC			
201.	March 21, 2022 Recording of	Relevance; Cumulative		
	Outbound Call to Plaintiffs from Ian's			
	Enterprise LLC			
202.	April 6, 2022 Recording of Outbound	Relevance; Cumulative		
	Call to Plaintiffs from Ian's Enterprise			
	LLC			
203.	Expert Report of Richard Windham	Hearsay, Lack of Foundation, Need for		
	with Accompanying Materials	Personal Knowledge; Impermissible		
204		Legal Conclusions		
204.	Documents received via Subpoena	Relevance; Hearsay; Cumulative		
	Duces Tecum from We Buy Homes			
200	LLC aka Sell My Fixer Upper			
208.	All other documents which are or	Objections reserved until exhibits		
	have been produced by Plaintiffs or	appropriately identified		
	by State Farm as part of discovery in			
	the litigation which are not objected			
200	to by State Farm	Compulations		
209.	Discovery responses, answers, and	Cumulative		
	objections received from Plaintiffs			

210.	Any documents produced in response	Objections	reserved	until	specific
	to a Subpoena Duces Tecum issued	document identified			
	by a party				

Respectfully submitted,

/s/Terry M. McKeever

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